

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
EASTERN DIVISION

IN RE: STANDFIELD, SHERLONDA (Chapter 13)

CASE NO. 16-13240

Debtor

MOTION AND NOTICE TO MODIFY CHAPTER 13 PLAN

Now comes Catherine Umberger as attorney for Debtor in the above-styled cause who files this Motion to Modify Chapter 13 Plan and would show as follows:

1. Debtor filed a Chapter 13 Bankruptcy on 09/20/2016. Debtor's Chapter 13 plan was confirmed on 12/7/2016.
In the Chapter 13 Plan filed by the Debtor, it provided that **Loanmaster** was to be paid \$1,006.25 plus interest of 5% for a **2008 Buick**.
2. Debtor proposes to surrender the vehicle to Loanmaster in satisfaction of its lien and all claims against debtor.
3. The vehicle is in nonworking condition.
4. Debtor further proposes to reduce their monthly plan payment along with any accompanying Trustee fees.
5. Debtor proposes that their Chapter 13 Plan be modified as necessary by the Trustee so that their plan completes within the 60 month period.
6. Debtor currently has about twenty five (25) months left in the Chapter 13 proceeding.

Wherefore, Premises Considered, Debtors pray that the court approve the Motion to Modify Plan as stated above.

Respectfully Submitted,

/s/ Catherine Umberger

Catherine Umberger, ESQ. (MS 104458)
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NOTICE TO ALL CREDITORS YOU HAVE 30 DAYS TO OBJECT TO THE MOTION TO MODIFY PLAN BY FILING AN OBJECTION WITH THE BANKRUPTCY COURT AT: UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF MS, 703 HWY 145 N., ABERDEEN, MS 39730

Objection Deadline: December 17, 2018

CERTIFICATE OF SERVICE

I, Catherine Umberger, the undersigned counsel, do hereby certify that I have this day served a true and correct copy of the foregoing **Motion to Modify Plan and Notice to Creditors** via electronic e-mail and/or United States mail, postage prepaid, upon the following:

o US Trustee USTPRegionAB.ECg@usdog.gov
Terre Vardaman vardaman13@gmail.com

LOAN MASTER/TITLE CASH
849 NORTH GLOSTER ST
TUPELO , MS 38801

DATED: November 15, 2018

/ s / Catherine Umberger
CATHERINE UMBERGER, ESQUIRE

